

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

REVISED RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS  
PATELUNAS TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER  
ADVOCATE  
(OCA/USPS-T15-3,4 AND 11)

The United States Postal Service hereby provides revised responses of witness Patelunas to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T15-3 and 4, filed on August 18, 1997 and OCA/USPS-T15-11, filed on September 8, 1997. The original responses to OCA/USPS-T15-3 and 34 were filed on September 2, 1997 and the original response to OCA/USPS-T15-11 was filed on September 22, 1997.


Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
October 15, 1997

Response of United States Postal Service Witness Patelunas  
to Interrogatories of  
Office of the Consumer Advocate  
(Revised 10/15/97)

OCA/USPS-T-15-3. Please refer to USPS-T-15, WP E, Table D at 8, concerning the TYBR attributable costs of post office boxes.

- a. Please confirm that the FY98 TYBR attributable cost of post office boxes is \$607,733,000. If you do not confirm, please explain.
- b. Please confirm that the TYBR attributable cost of caller service is included in the FY98 TYBR attributable cost of post office boxes. If you do not confirm, please explain.
- c. Please provide the FY98 TYBR attributable cost of caller service. Please show all calculations and provide citations to any figures used.

OCA/USPS-T-15-3 Response:

- a. It is confirmed that the volume variable cost of post office boxes is \$607,733,000.
- b. It is confirmed that the volume variable cost of caller service is included in the FY98 TYBR volume variable cost of post office boxes.
- c. The FY98 TYBR volume variable cost for caller service is included in the FY98 TYBR volume variable cost of post office boxes and it cannot be isolated.

Response of United States Postal Service Witness Patelunas  
to Interrogatories of  
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(Revised 10/15/97)

OCA/USPS-T-15-4. Please refer to USPS-T-15, WP E, Table D at 8, concerning the TYBR attributable costs of post office boxes.

- a. Please confirm that TYBR attributable costs for post office boxes consist of three categories of cost: Space Support, Space Provision and All Other. If you do not confirm, please explain.
- b. Please provide the TYBR Space Support and All Other costs by CAG.

OCA/USPS-T-15-4 Response:

- a. It is confirmed that these are the TYBR volume variable cost categories of post office boxes used by Witness Lion, USPS-T-24.
- b. This is not available.

Response of United States Postal Service Witness Patelunas  
to Interrogatories of  
Office of the Consumer Advocate  
(Revised 10/15/97)

OCA/USPS-T15-11. Please refer to your response to OCA/USPS-T24-60b, redirected to you by Witness Lion, where it states

For instance, the following changes occurred from Base Year 1996 to Test Year After Rates 1998 for components 1099 (Total Key of Space Components) and 1199 (Total Key of Rental Value Components):

Please confirm that the changes to the two distribution keys identified in the quote above are the only changes to distribution keys for post office boxes from the BY to the TYAR. If you do not confirm, please explain, provide the percentage change, the name and number of the component(s), and a citation for any components changed.

OCA/USPS-T15-11 Response:

Please see my response to OCA/USPS-T15-14.

## DECLARATION


I, Richard Patelunas, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 10/15/97

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Susan M. Duchek

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